

REMARKS

Claims 1-20 are pending in this application.

I. Claim Rejections

The Office Action (i) rejects claims 1-7 and 10-20 under 35 U.S.C. §103(a) over U.S. Patent No. 6,866,510 to Polanyi in view of U.S. Patent No. 6,234,802 to Pella, and further in view of U.S. Patent No. 6,741,833 to McCormick; and (ii) rejects claims 8-9 under 35 U.S.C. §103(a) over Polanyi in view of Pella and McCormick, and further in view of U.S. Patent No. 7,043,438 to Murakami. Applicants respectfully traverse the rejections.

Polanyi discloses a second language writing skills instruction system 100 for enabling a user to learn a written culture (col. 1, lines 38-43), such as expository writing (col. 3, lines 62-64). In operation, a user loads writing the user has previously composed (user text) from text storage memory 170 into memory 120 (col. 3, lines 10-14). The user text is segmented into "text building units", analyzed, and a structural representation is built (col. 3, lines 14-25). This structural representation is compared to stored structural representations of discourse and differences are noted (col. 3, lines 26-38). These differences are compared to previously identified flaws stored in the system (col. 3, lines 30-34). A more "appropriate" structural representation is then retrieved and presented to the user (col. 3, lines 38-55) so that the user can improve his or her second language writing skills in the identified writing culture.

Regarding independent claims 1 and 19-20, Polanyi fails to disclose: (1) a memory storing a scenario having tasks to be carried out in the language; (2) a connection manager able to support multiple simultaneous connections from other user systems; (3) a virtual reality subsystem; and (4) a communication subsystem providing at least one channel in which users can communicate.

Pella is directed to an interactive 3-D (three dimensional) graphical representation of an environment on a personal computer 20. In operation, a user interacts in the environment with other "people" (persons 94) controlled by the system, which challenge the user with questions and tasks requiring responses (Abstract). A speech recognition system interprets the responses and acknowledges correct responses (col. 9, lines 6-19). Pella fails to disclose that any interaction can exist between different personal computers 20.

Thus, Pella fails to disclose (1) a connection manager able to accept one or more simultaneous connections from other user systems; and (2) a communication subsystem for providing at least one channel over which users can communicate.

One of ordinary skill in the art would not have been motivated to combine the interactive capabilities of Pella with the system 100 of Polanyi. Polanyi is directed to helping users improve their writing abilities within a writing culture such as expository writing. Thus, users compose writing pieces, and when finished, input their writing to the system of Polanyi for analysis and critique. In contrast, Pella is directed to helping users improve verbal interaction skills (both speaking skills and verbal understanding skills). Thus, Pella discloses a virtual reality environment in which users interact with the persons 94 (to practice interaction skills) and are given tasks to perform (to practice understanding).

Writing is generally performed over longer periods of time than verbal interaction and without interaction with others. Thus, one of ordinary skill in the art would not have been motivated to combine the disclosures of Polanyi and Pella because adding a virtual reality environment with interaction and tasks to perform would have no benefit to a system designed to teach a writing culture. Further, the Office Action's asserted reason for the proposed combination, "to provide a more realistic setting and improve the learning experience of the user" does not make sense. A user uses Polanyi's system by providing it with a finished writing piece (user text). Because the user's writing has been completed prior

to the use of Polanyi's system, adding the virtual reality system of Pella will add no benefit to the user of Polanyi's system. Alternatively, even if the user composes his or her writing on the system of Polanyi, a virtual environment with verbal interaction, commands, and tasks would, if anything, detract the user from composing his or her writing, thus causing the system of Polanyi to be unsuitable for its intended use. Thus, Applicants submit that the proposed combination of Polanyi, modified by the virtual reality system of Pella, is improper.

McCormick is directed to teaching foreign languages and discloses a learning activity platform having chat displays 88 (player 1) and 88' (player 2) (Fig. 2) allowing communication between players. McCormick discloses that players play games and engage in cooperative assignments (col. 3, lines 64 - col. 4, line 2).

McCormick is directed to an interactive system requiring cooperation, wherein players play multiplayer games or cooperate in collaborative assignments. In contrast, Polanyi's system is directed to a user have a writing piece analyzed and critiqued within a writing culture, the written pieces being composed off-line or otherwise prior to the use of Polanyi's system. A user submitting a writing piece to the system of Polanyi for analysis and critique would already be finished with his or her writing, and thus would have no benefit of an interactive system such as that of McCormick. Thus, one of ordinary skill in the art would not have been motivated to combine the communication capabilities of McCormick to the system of Polanyi. Applicants therefore submit that the proposed combination of McCormick to the other prior art is improper.

For the foregoing reasons, Applicants request withdrawal of the rejections.

II. Conclusion

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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